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8 *Proposed Counsel for Debtor and Debtor-in-Possession,*  
9 Spectrum Link, Inc.

10  
11 UNITED STATES BANKRUPTCY COURT  
12  
13 CENTRAL DISTRICT OF CALIFORNIA  
14  
15 LOS ANGELES DIVISION

16  
17 In re: ) CASE NO.: 2:21-bk-16403-VZ  
18 ) Chapter 11  
19 )  
20 ) NOTICE OF MOTION AND DEBTOR'S  
21 ) **EMERGENCY MOTION FOR ORDER**  
22 ) **AUTHORIZING INTERIM USE OF**  
23 ) **CASH COLLATERAL; MEMORANDUM**  
24 ) **OF POINTS AND AUTHORITIES;**  
25 ) **DECLARATIONS OF MARILYN M.**  
26 ) **ADJANGBA AND MICHAEL JAY**  
27 ) **BERGER IN SUPPORT THEREOF**  
28 )  
29 ) [LBR 2081-1 and LBR 9075]  
30 )  
31 )  
32 ) Hearing Scheduled For:  
33 ) Date: August 17, 2021  
34 ) Time: 1:00 p.m.  
35 ) Place: Courtroom 1368 [remotely via phone]  
36 ) 255 E. Temple Street, 13<sup>th</sup> Floor  
37 ) Los Angeles, CA 90012  
38 )  
39 ) Follow Judge Zurzolo's Appearance by Phone  
40 ) Procedures at  
41 ) <https://www.cacb.uscourts.gov/judges/honorab>  
42 ) le-vincent-p-zurzolo.  
43 )  
44 ) Toll-Free Conference Line: (877) 411-9748  
45 ) Passcode: 5919677

1                   **TO THE HONORABLE VINCENT P. ZURZOLO, JUDGE OF THE UNITED**  
2                   **STATES BANKRUPTCY COURT, CENTRAL DISTRICT OF CALIFORNIA, THE**  
3                   **OFFICE OF THE UNITED STATES TRUSTEE, TO THE SECURED CREDITORS, TO**  
4                   **THE TWENTY LARGEST UNSECURED CREDITORS, AND TO ALL OTHER**  
5                   **INTERESTED PARTIES AND THEIR COUNSEL OF RECORD:**

6                   Spectrum Link, Inc., the Debtor and Debtor-in-Possession (“Debtor”) moves this Court  
7                   for an order authorizing it to use the cash collateral of its secured creditors, the Employment  
8                   Development Department (“EDD”) and The 3250 Wilshire Blvd. Partners (“3250 Wilshire”),  
9                   (collectively with EDD to be referred to as the “Secured Creditors”)<sup>1</sup> (the “Motion”).

10                  In order to effectively reorganize, Debtor must be able to use the cash collateral of its  
11 Secured Creditors in order to pay the reasonable expenses it incurs during the ordinary course of  
12 its business. The Debtor requests authority from this court to approve interim use of cash  
13 collateral to pay the necessary payroll, payroll taxes, insurance, utilities, rent, and other  
14 necessary business expenses as set forth in the attached cash collateral budget, and incorporated  
15 herein as Exhibit-1, to continue its business operation without any interruption. Use of the cash  
16 collateral as proposed by the Debtor will allow the Debtor to continue doing business, preserve  
17 the Debtor's assets for the benefit of the estate and the creditors, specifically the Secured  
18 Creditors. The Debtor has a reasonable prospect of reorganizing through chapter 11. The  
19 continued use of cash collateral to ensure no interruption of Debtor's business will further allow  
20 Debtor to emerge as a reorganized Debtor.

21                  **PLEASE TAKE NOTICE** that the hearing on the Motion will take place on August 17,  
22 2021 at 1:00 p.m. in Courtroom 1368 of the above-referenced Bankruptcy Court. Appearances

23  
24  
25  
26                  <sup>1</sup> The information for secured creditors was obtained by conducting a UCC Search on the California  
27 Secretary of State website at: <https://bizfileonline.sos.ca.gov/search/ucc>. The Judgment Lien of The 3250  
28 Wilshire Blvd. Partners was recorded on May 23, 2021, which falls within the 90-day preference period  
and is subject to an avoidance action under 11 U.S.C. Section 547(b). Employment Development  
Department filed a total of 4 tax liens against the Debtor. One of the tax liens filed on June 11, 2021 for  
\$3,418.67, falls within the 90-day preference period, and is subject to an avoidance action pursuant to 11  
U.S.C. Section 547(b).

1 may be made in person or telephonically. See Judge Zurzolo's telephonic appearance procedures  
2 on the first page of the Motion.

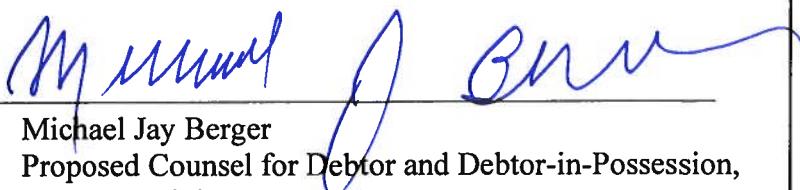
3 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Motion is due no later  
4 than 11:00 a.m. on August 17, 2021.

5 This motion is made on the basis of the Declarations of Marilyn M. Adjangba and  
6 Michael Jay Berger, the within Points and Authorities, and on such other evidence as the Court  
7 elects to consider prior to or at the hearing on this matter.

8 WHEREFORE, Debtor asks that this Court authorize interim use of Secured Creditors'  
9 cash collateral, as set forth herein, and for any other relief deemed necessary and proper.  
10

11 LAW OFFICES OF MICHAEL JAY BERGER  
12

13 Dated: 8/16/2021

14 By:   
15 Michael Jay Berger  
16 Proposed Counsel for Debtor and Debtor-in-Possession,  
17 Spectrum Link, Inc.

1                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2                   **I.           STATEMENT OF FACTS**

3                   **A. General Description of the Debtor**

4                   Spectrum Link, Inc. was started in October 2013 by Bernard S. Mayfield, who passed  
5 away in April 2021 from Covid-19. Debtor is a leading internet service provider that offers  
6 custom internet services throughout the country, including unique temporary broadband service  
7 to those requiring temporary internet connections. It also provides installation services in many  
8 of the places that “wired” providers cannot reach, and its superior broadband service is backed  
9 by the fact installation process and copper-free wireless infrastructure. Debtor offers its  
10 customers a 24/7 care. Spectrum Link offers registered broadband link-owners 100%  
11 independent ownership of their broadband license, links and equipment.

12                   **B. Events Precipitating the Chapter 11 Bankruptcy Filing**

13                   The major event that precipitated the filing of Debtor’s Chapter 11 bankruptcy case was the  
14 passing of Mr. Mayfield in April 2021, as a result of which the Debtor’s operation was  
15 negatively impacted, resulting in Debtor’s inability to pay the monthly obligations to various  
16 tower owners pursuant to the licensing agreements, the monthly obligations for the office space,  
17 among others.

18                   **C. Prospects of Reorganization**

19                   The Covid-19 pandemic has negatively impacted the country’s economy and devastated  
20 certain sectors of the economy. Debtor’s operations have been impacted by the pandemic as well.  
21 Debtor’s principal, Mr. Mayfield passed away in April 2021 from Covid-19. However, Debtor is  
22 confident that it can emerge as a reorganized Debtor. It has a number of contractors lined up and  
23 is confident that it can obtain more contracts to generate the funds necessary to propose a  
24 feasible reorganization plan.

25                   **II.           SECURED CREDITORS**

26                   The following creditors have an interest secured by Debtor’s assets:

- 1        1. Employment Development Department (“EDD”): State Tax Lien filed on 7/21/2020
- 2        for \$1,061.63;
- 3        2. EDD: State Tax Lien filed on 9/2/2020 for \$1,182.73;
- 4        3. EDD: State Tax Lien filed on 10/30/2020 for \$1,873.79;
- 5        4. EDD: State Tax Lien filed on 6/11/2021 for \$3,418.67<sup>2</sup>; and
- 6        5. The 3250 Wilshire Blvd. Partners: Notice of Judgment Lien filed on 5/23/2021 for
- 7        \$25,147.39<sup>3</sup>.

8              The Debtor proposes that it be authorized to use the cash collateral of its Secured  
9 Creditors for the purpose of paying the reasonable, necessary and ordinary expenses of operating  
10 the business.

11              **III.**

12              **A. THE USE OF THE CASH COLLATERAL FOR OPERATIONS**  
13              **SHOULD BE AUTHORIZED IN ACCORDANCE WITH THE BUDGET**

14              To obtain court authorization to use cash collateral, a debtor must establish that the  
15 “interest” of creditors holding liens on the subject collateral will remain “adequately protected.”  
16 11 U.S.C. § 363(e). Pursuant to *United States v. Timbers of Inwood Forest*, 484 U.S. 365, 108 S.  
17 Ct 626 (1988), the “interest in property” entitled to adequate protection under 11 U.S.C. §363(e)  
18 is no more or less than the “value of the collateral” that is subject to the secured creditor’s lien.

19              **Under this holding, a debtor is merely required to show that the secured creditor’s**  
20 **collateral will not decline in value under the Debtors’ proposed usage of cash collateral.**

21              *Timbers*, 108 S. Ct at 633; *In re Ledgemere Land Corp.*, 116 B.R. 338, 343 (Bankr. D.Mass.  
22 1990) (So long as the receivables being collected and used by the debtor are being replaced by  
23 sufficient new receivables in which the creditor is granted a security interest, the creditor is

25  
26              <sup>2</sup> Employment Development Department filed a total of 4 tax liens against the Debtor. One of the tax liens  
27 filed on June 11, 2021 for \$3,418.67, falls within the 90-day preference period, and is subject to an  
28 avoidance action pursuant to 11 U.S.C. Section 547(b).

3 The Judgment Lien of The 3250 Wilshire Blvd. Partners was recorded on May 23, 2021, which falls  
within the 90-day preference period and is subject to an avoidance action under 11 U.S.C. Section  
547(b).

adequately protected); *In re Johnson*, 90 B.R. 973, 978 (Bankr. D. Minn. 1988) (Since value of the collateral has not declined, the bank is not impaired and is not entitled to receive adequate protection payments); *In re Century Inv. Fund VII, Ltd. Partnership*, 96 B.R. 884, 887 (Bankr. E.D. Wis. 1989) (Where value appears to be stable, creditor is not entitled to adequate protection payments); *In re Kessler*, 86 B.R. 134, 136 (Bankr. C.D. Ill. 1988) (under *Timbers*, the sellers are not entitled to adequate protection payments, as there was no showing the 80-acre tract was depreciating in value); *In re Anderson*, 88 B.R. 877, 889 (Bankr. N.D. Ind. 1988) (Secured creditor required to show a necessity for adequate protection by showing a decline in asset value from the petition date); *In re McCombs Properties VI, Ltd.*, 88 B.R. 261 (Bankr. C.D.Cal. 1988); *In re Elmore*, 94 B.R. 670 (Bankr. C.D. Cal. 1988). Alternatively, a debtor can make an adequate protection showing even where the collateral is declining in value, as long as the creditor's interest therein is protected by a reasonable equity cushion. See, *In re Mellor*, 734 F. 2d 1396 (9th Cir. 1984); *In re Harrington & Richardson, Inc.*, 48 B.R. 431 (Bankr. D.Mass. 1985); *In re Mccombs Properties Vi, Ltd.*, 88 B.R. 261 (Bankr. C.D.Cal. 1988).

In order to effectively reorganize, Debtor must be able to use the cash collateral of its Secured Creditors in order to pay the reasonable expenses it incurs during the ordinary course of its business. The Debtor requests authority from this court to approve interim use of cash collateral to pay the necessary payroll, payroll taxes, insurance, utilities, rent, and other necessary business expenses as set forth in the attached cash collateral budget, and incorporated herein as Exhibit-1, to continue its business operation without any interruption. Use of the cash collateral as proposed by the Debtor will allow the Debtor to continue doing business, preserve the Debtor's assets for the benefit of the estate and the creditors, specifically the Secured Creditors.

If the Debtor's access to the cash collateral is interrupted for even a brief period of time, the consequences would be disastrous for the creditors of the estate. The Debtor would be unable to operate its business without any interruption. The employees and the clients would leave and the business would shut down, making its value zero. As such, it is in the best interests

1 of the estate and its creditors for the Debtor to be authorized to use the cash collateral to continue  
2 to operate and maintain its law practice business.

3       Although the Budget represents the Debtor's best estimate of the necessary expenses  
4 associated with the business, the needs of the business may fluctuate. Therefore, the Debtor  
5 requests Court authority to deviate from the total expenses contained in the Budget by no more  
6 than 15% and to deviate by category (provided the Debtor does not pay any expenses outside any  
7 of the approved categories) without the need for further Court order or the express written  
8 consent of Secured Creditors in advance unless such expenditure is an emergency and then the  
9 Debtor shall notify the Secured Creditors of the expenditures immediately.  
10

11                   **B. SECURED CREDITORS' INTERESTS ARE ADEQUATELY PROTECTED**  
12                   **BY THE CONTINUED OPERATION OF THE DEBTOR**

13       Pursuant to Section 363(c)(2), the Court may authorize the debtor to use a secured  
14 creditor's cash collateral if the Court determines that the secured creditor is adequately protected.  
15 *Pistole v. Mellor (In re Mellor)*, 734 F.2d 1396, 1400 (9th Cir. 1984). See also *O'Connor, supra*,  
16 808 F.2d at 1398; *McCombs Properties VI, Ltd. v. First Texas Savings Association (In re*  
17 *McCombs Properties VI, Ltd.)*, 88 B.R. 261, 265 (Bankr. C.D. Cal. 1988). In ordinary  
18 circumstances, a secured creditor is to be protected against a decrease in value which directly  
19 affects the secured creditor's interest in its collateral. See *United Savings Association of Texas v.*  
20 *Timbers of Inwood Forest Associates, Ltd.*, 484 U.S. 365, 108 S.Ct. 626, 630, (1988); Section  
21 506(a) of the Bankruptcy Code "limit(s) the secured status of a creditor (i.e., the secured  
22 creditor's claim) to the lesser of the [allowed amount of the] claim or the value of the collateral."  
23 *McCombs, supra*, 88 B.R. at 266.

24       As a general rule, a debtor may use cash collateral where such use would enhance or  
25 preserve the value of the collateral. *In re Stein, supra*, 19 B.R. at 460; see also *McCombs, supra*,  
26 88 B.R. at 267.  
27  
28

1       Here, as mentioned above, EDD and The 3250 Wilshire Blvd. Partners are the only  
2 secured creditors that have a security interest in the assets of the Debtor. Their interests are  
3 safeguarded by the value of the Debtor's assets and the continued operation of the Debtor.  
4 Debtor has no reason to believe that value of cash, the accounts receivable, and other tangible  
5 property are declining in value.

6       Debtor is not offering any monthly adequate protection payments to EDD at this time  
7 because EDD's claim amount is nominal and its interested is adequately protected by Debtor's  
8 current cash, the receivables, and the continued operation of Debtor's business. EDD's state tax  
9 liens total \$7,536.82. Debtor will pay EDD through the plan in full within 5-years from the  
10 petition date at the applicable interest rate.

11       The notice of judgment lien of The 3250 Wilshire Blvd. Partners was filed within the 90-  
12 day preference and is subject to an avoidance per 11 U.S.C. Section 547(b). As such, at this  
13 time, the Debtor is not offering any monthly adequate protection payments to The 3250 Wilshire  
14 Blvd. Partners.

15       The use of cash collateral is essential to continue the ordinary maintenance and  
16 operations of Debtor's business. Without the use of the cash collateral, the Debtor will be unable  
17 to pay will be unable to pay the necessary payroll and payroll taxes, insurance, on-going costs,  
18 rent, utilities and other necessary business expenses that arise in connection with the operation of  
19 its type of business. As such, unless the Debtor is permitted to use the cash collateral, the value  
20 of the business will rapidly diminish.

22  
23       **C. IN DETERMINING ADEQUATE PROTECTION, THE COURT SHOULD  
PROMOTE REORGANIZATION**

24       In determining adequate protection, Courts have stressed the importance of promoting a  
25 debtor's reorganization. In *In re O'Connor*, supra, the Tenth Circuit stated:

27       In this case, Debtors, in the midst of a Chapter 11 proceeding, have  
28 proposed to deal with cash collateral for the purpose of enhancing  
the prospects of reorganization. This quest is the ultimate goal of

1 Chapter 11. Hence, the Debtor's efforts are not only to be  
2 encouraged, but also their efforts during the administration of the  
3 proceeding are to be measured in light of that quest. Because the  
4 ultimate benefit to be achieved by a successful reorganization  
5 inures to all the creditors of the estate, a fair opportunity must be  
6 given to the Debtors to achieve that end. Thus, while interests of  
the secured creditor whose property rights are of concern to the  
court, the interests of all other creditors also have bearing upon the  
question of whether use of cash collateral shall be permitted during  
the early stages of administration.

7 808 F.2d at 1937.

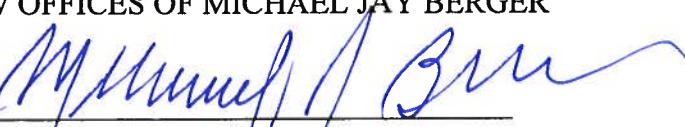
8 In order to promote Debtor's reorganization, the Court should grant the relief requested  
9 herein. The Debtor has demonstrated herein that the use of the cash collateral as proposed by the  
10 Debtor will preserve assets and operations of the Debtor for the benefit of this estate and the  
11 creditors, including the EDD and the 3250 Wilshire Blvd Partners. Indeed, a successful  
12 reorganization depends upon the use of cash collateral as proposed herein.

13 **IV. CONCLUSION**

14 Based upon the foregoing, the Debtor respectfully requests that the Court grant the relief  
15 herein requested, authorizing interim use of cash collateral on the terms and conditions described  
16 in the Motion and the exhibits thereto and granting such other and further relief as is just and  
17 proper under the circumstances.  
18

19 Dated: 8/16/2021

20 LAW OFFICES OF MICHAEL JAY BERGER

21 By: 

22 MICHAEL JAY BERGER

23 *Proposed Counsel for Debtor and Debtor-in-  
Possession, Spectrum Link, Inc.*

1                   **DECLARATION OF MARILYN M. ADJANGBA**

2                   I, Marilyn M. Adjangba, declare and state as follows:

3                   1.         I am the Chief Executive Officer of Spectrum Link, Inc., the debtor and debtor-in-  
4 possession in the above-captioned matter (the “Debtor” or the “Firm”). I have personal  
5 knowledge of the facts set forth below and if called to testify as to those facts, I could and would  
6 competently do so.

7                   2.         I make this declaration in support of Debtor’s Emergency Motion for Order  
8 Authorizing Interim Use of Cash Collateral (the “Motion”).

9                   3.         On August 11, 2021, the Debtor filed its Chapter 11 bankruptcy petition. This is  
10 the Debtor’s first voluntary bankruptcy petition filing.

11                  4.         Spectrum Link, Inc. was started in October 2013 by Bernard S. Mayfield, who  
12 passed away in April 2021 from Covid-19. Debtor is a leading internet service provider that  
13 offers custom internet services throughout the country, including unique temporary broadband  
14 service to those requiring temporary internet connections. It also provides installation services in  
15 many of the places that “wired” providers cannot reach, and its superior broadband service is  
16 backed by the fact installation process and copper-free wireless infrastructure. Debtor offers its  
17 customers a 24/7 care. Spectrumlink offers registered broadbank link-owners 100% independent  
18 ownership of their broadband license, links and equipment.

19                  5.         The major event that precipitated the filing of Debtor’s Chapter 11 bankruptcy  
20 case was the passing of Mr. Mayfield in April 2021, as a result of which the Debtor’s operation  
21 was negatively impacted, resulting in Debtor’s inability to pay the monthly obligations to various  
22 tower owners pursuant to the licensing agreements, the monthly obligations for the office space,  
23 among others.

24                  6.         The Covid-19 pandemic has negatively impacted the country’s economy and  
25 devastated certain sectors of the economy. Debtor’s operations have been impacted by the  
26 pandemic as well. Debtor’s principal, Mr. Mayfield passed away in April 2021 from Covid-19.  
27 However, Debtor is confident that it can emerge as a reorganized Debtor. It has a number of

1 contractors lined up and is confident that it can obtain more contracts to generate the funds  
2 necessary to propose a feasible reorganization plan.

3       7. The Debtor proposes that it be authorized to use the cash collateral of its Secured  
4 Creditors for the purpose of paying the reasonable, necessary and ordinary expenses of operating  
5 the business pursuant to the proposed Budget, a copy of which is attached hereto as **Exhibit-1**.  
6 Although the Budget represents the Debtor's best estimate of the necessary expenses associated  
7 with the business, the needs of the business may fluctuate. Therefore, the Debtor requests Court  
8 authority to deviate from the total expenses contained in the Budget by no more than 15% and to  
9 deviate by category (provided the Debtor does not pay any expenses outside any of the approved  
10 categories) without the need for further Court order or the express written consent of Secured  
11 Creditors in advance unless such expenditure is an emergency and then the Debtor shall notify  
12 the Secured Creditors of the expenditures immediately.

8. If the Debtor's access to the cash collateral is interrupted for even a brief period of  
time, the consequences would be disastrous for the creditors of the estate. The Debtor would be  
unable to operate its business without any interruption. The employees and the clients would  
leave and the business would shut down, making its value zero. As such, it is in the best interests  
of the estate and its creditors for the Debtor to be authorized to use the cash collateral to continue  
to operate and maintain its law practice business.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed on August 16, 2021 in Downey, California.

By:   
Marilyn M. Adjanga

1                   DECLARATION OF MICHAEL JAY BERGER

2                   I, Michael Jay Berger, declare and state as follows:

3                   1. I am an Attorney at Law, licensed to practice before all of the courts in the State  
4                   of California, and in the United States District Court for the Central District of California. I am  
5                   the sole owner of the Law Offices of Michael Jay Berger ("Applicant").

6  
7                   2. I am the proposed bankruptcy counsel for Spectrum Link, Inc., the Debtor and  
8                   Debtor-in-Possession (the "Debtor").

9  
10                  3. I make this declaration in support of Debtor's Emergency Motion for Order  
11                  Authorizing Interim Use of Cash Collateral (the "Motion").

12                  4. The UCC search results reflect the following filings:

13                  - Employment Development Department ("EDD"): State Tax Lien filed on  
14                  7/21/2020 for \$1,061.63;  
15                  - EDD: State Tax Lien filed on 9/2/2020 for \$1,182.73;  
16                  - EDD: State Tax Lien filed on 10/30/2020 for \$1,873.79;  
17                  - EDD: State Tax Lien filed on 6/11/2021 for \$3,418.67<sup>4</sup>; and  
18                  - The 3250 Wilshire Blvd. Partners: Notice of Judgment Lien filed on 5/23/2021  
19                  for \$25,147.39<sup>5</sup>.

20                  5. Debtor is not offering any monthly adequate protection payments to EDD at this  
21                  time because EDD's claim amount is nominal and its interest is adequately protected by  
22                  Debtor's current cash, the receivables, and the continued operation of Debtor's business. EDD's  
23                  state tax liens total \$7,536.82. Debtor will pay EDD through the plan in full within 5-years from  
24                  the petition date at the applicable interest rate.

25  
26                  

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<sup>4</sup> Employment Development Department filed a total of 4 tax liens against the Debtor. One of the tax liens  
27                  filed on June 11, 2021 for \$3,418.67, falls within the 90-day preference period, and is subject to an  
28                  avoidance action pursuant to 11 U.S.C. Section 547(b).

<sup>5</sup> The Judgment Lien of The 3250 Wilshire Blvd. Partners was recorded on May 23, 2021, which falls  
within the 90-day preference period and is subject to an avoidance action under 11 U.S.C. Section  
547(b).

6. The notice of judgment lien of The 3250 Wilshire Blvd. Partners was filed within the 90-day preference and is subject to an avoidance per 11 U.S.C. Section 547(b). As such, at this time, the Debtor is not offering any monthly adequate protection payments to The 3250 Wilshire Blvd. Partners.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed on August 16, 2021 in Beverly Hills, California.

By: Michael Jay Berger  
Michael Jay Berger

## **EXHIBIT-1**

## 6-MONTH PROJECTED INCOME AND EXPENSES

<b>General Liability Insurance</b>	\$4,787.00	\$4,787.00	\$4,787.00	\$4,787.00	\$4,787.00	\$4,787.00
<b>Workers Compensation Insurance</b>	\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00
<b>Frequency License</b>	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00	\$200.00
<b>Federal Income Taxes</b>	\$1,908.00	\$1,908.00	\$1,908.00	\$1,908.00	\$1,908.00	\$1,908.00
<b>State Income Taxes</b>	\$423.00	\$423.00	\$423.00	\$423.00	\$423.00	\$423.00
<b>Local Income Taxes</b>	\$423.00	\$423.00	\$423.00	\$423.00	\$423.00	\$423.00
<b>US Trustee's Quarterly Fees</b>			\$650.00			\$650.00
<b>General Bankruptcy Counsel's Legal Fees</b> (Upon Court's Approval; Debtor's counsel is agreeable to payment plan if Debtor does not have the funds available to pay counsel when the fee application is approved)						
<b>Total Expenses</b>	<b>\$44,598.00</b>	<b>\$75,538.55</b>	<b>\$76,188.55</b>	<b>\$80,538.55</b>	<b>\$80,538.55</b>	<b>\$76,188.55</b>
<b>Net Income</b>	<b>\$19,402.00</b>	<b>\$461.45</b>	<b>\$811.45</b>	<b>\$4,461.45</b>	<b>\$4,461.45</b>	<b>\$8,811.45</b>
